UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA	)	
	)	
VS.	)	CR No. 06-003ML
	)	
JAMAL NORTHUP	)	

MOTION FOR SENTENCE CONSIDERATION

Now comes Jamal Northup, the Defendant in the above captioned matter, and moves this Honorable Court, pursuant to Local Rule of Criminal Procedure 32 (2006), to consider and impose a sentence that is sufficient, but not greater than necessary, in compliance with18 U.S.C. § 3553(a). After considering all the appropriate information present in this case, the Court should conclude that the advisory guidelines call for a sentence longer than what is sufficient to comply with 18 U.S.C. § 3553(a). Mr. Northup proposes a sentence between 36 and 48 months of incarceration, which will be sufficient in this case to satisfy the purposes of sentencing.

Respectfully Submitted
Jamal Northup,
By and through his counsel

/s/ Kevin J. Fitzgerald
Assistant Federal Defender

Certification

I hereby certify that on this 3rd day of August, 2006, I filed and served by electronic notification the within motion and accompanying memorandum to AUSA Peter Nerohna, 50 Kennedy Plaza, 8th Floor, Providence 02903.

/s/ Kevin J. Fitzgerald